



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

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February 3, 2025

By ECF

The Honorable Joan M. Azrack
United States District Judge
United States District Court
Eastern District of New York
100 Federal Plaza
Central Islip, New York 11722

Re: United States v. Arevalo-Chavez, et al.
Criminal Docket No. 22-429 (JMA)

Dear Judge Azrack:

We write on behalf of the government in the above captioned matter, and with the consent of all defense counsel and their clients, to respectfully confirm the joint request for an adjournment of the status conference that had been set for January 30, 2025 before the Court.

At this time, the defendants and their counsel are continuing to review the voluminous Rule 16 discovery that has been produced to date. Additionally, the government anticipates producing supplemental discovery materials in the coming weeks. Furthermore, the government and several counsel have been engaged in discussions concerning a potential resolution of this matter short of trial. However, the parties require additional time in order to continue, and complete, these discussions.

For the foregoing reasons, and in consultation with all counsel and with Your Honor's Chambers, it is respectfully requested that the January 30 status conference be adjourned to a date and time convenient for all counsel and the Court. Several counsel have suggested an early March date, provided that such a date is convenient for the Court. Additionally, in light of the foregoing, the government respectfully requests the exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), in the interests of justice, from today until the next conference date set by the Court. The undersigned government counsel have conferred with counsel for each of the defendants, who have indicated that they, and their respective clients, have no objection to this request. Further, this has previously been

designated as a complex case, pursuant to 18 U.S.C. § 3161(h)(7)(B)(ii), and the reasons for that designation remain.

Respectfully submitted,

JOHN J. DURHAM
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